

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF MASSACHUSETTS**

C.A. NO. 05-40075FDS

DANIEL HOUDE,)
)
)
Plaintiff,)
)
)
v.)
)
ROBERT TURGEON, STEPHEN GUNNERSON,)
KEVIN JOHANSON, MATTHEW D'ANDREA,)
BRIAN HALLORAN, THOMAS DUFFY,)
SEAN MCCANN and CITY OF WORCESTER)
)
)
Defendants.)
)

PLAINTIFF'S WITNESS LIST

Plaintiff Daniel Houde hereby submits his Trial Witness List per the Court's January 4, 2008 Order

- (a) Plaintiff Daniel Houde shall testify as to all allegations in the complaint as well as damages including emotional distress.
- (b) All Defendants shall be called to testify regarding the allegations in the complaint as well as the inconsistencies in their statements at deposition. These Defendants include Robert Turgeon, Stephen Gunnerson, Kevin Johanson, Matthew D'Andrea, Brian Halloran, and Thomas Duffy.
- (c) Renee Rudy shall be called to testify regarding the events of May 20, 2002 as she was a witness to part of the events of that evening. Her present address is unknown.

(d) All physicians and medical providers identified in the medical records of Mr. Houde from the week of May 20, 2002 regarding their treatment of Mr. Houde should the medical records not be admitted by agreement.

(e) David Zirlen, 20 Main Street, Natick, Massachusetts may be called to testify regarding Mr. Houde's claim of harassment by members of the Worcester Police prior to May 20, 2002.

(f) Mark Macero, Worcester County Probation Department, Worcester, Massachusetts may be called to testify regarding Mr. Houde's claim of harassment by members of the Worcester Police prior to May 20, 2002.

(g) Lt. Edward McGinn, Worcester Police Department may be called regarding Mr. Houde's claims and his involvement after Houde's arrest.

(h) Witnesses on Defendants' Witness List.

(i) Rebuttal Witnesses as necessary. These may include other individuals making claims against Worcester Officers to the extent that such claims are denied at trial. These include: Amador Perez, Robert Berman, Jose Betencourt, Brandon Blair, Randy Boucher, Angelo Caron, Charles Evangelista, Kevin Jaroszuk, Dorene Schultz, Javier Soto, Richard Tousignant, Raymond Dennison and Shawn Wilder

(j) Sean McCann, Worcester Police Department may be called regarding Mr. Houde's claims and his involvement after Houde's arrest.

(k) Robert Farrar, Worcester Police Department may be called regarding Houde's claims that he was harassed, in part, because he competed in business against Officer Farrar's father.

(l) John W. Lewis, Worcester Police Department may be called regarding Mr. Houde's claims and his involvement after Houde's arrest. Officer Lewis may also be questioned regarding the WPD policies and procedures as per his deposition.

(m) Captain Gerald Vizzo, Worcester Police Department may be called regarding Mr. Houde's claims and his involvement after Houde's arrest.

(n) Capt. Bruce Bousquet, Worcester Police Department may be called regarding Mr. Houde's claims and his involvement after Houde's arrest.

(o) Lt. Edward Provencal, Worcester Police Department may be called regarding Mr. Houde's claims and his involvement after Houde's arrest.

(p) Sgt. James Grady, Worcester Police Department may be called regarding Mr. Houde's claims and his involvement after Houde's arrest.

(q) Donald Houde may be called to testify regarding Mr. Houde's injuries and appearance after the incident alleged in the Complaint.

(r) Edward D. Burkinshaw, UMass Medical Center, Keeper of Records may be called if the medical records are not introduced by agreement.

(s) Scott Richardson, UMass Medical Center, Keeper of Records may be called if the medical records are not introduced by agreement.

(t) St. Vincent Hospital, Keeper of Records may be called if the medical records are not introduced by agreement.

(u) Gary J. Gemme, Chief, Worcester Police Department, may be called to testify regarding the policies and procedures of the Worcester Police Department.

Respectfully submitted,

PLAINTIFF DANIEL HOUDE,

By his attorney,

/s/ Timothy J. Perry

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Certificate Regarding Service

I hereby certify that this document was served upon all counsel of record by the Court's ECF system.

Date: January 23, 2008

/s/ Timothy J. Perry

Timothy J. Perry